



January 29, 2010

Lisa Jackson  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460-0001

Dear Administrator Jackson:

The Sierra Club welcomes and applauds your commitment to stronger programs to protect communities from toxic chemicals. We strongly support your recent statement:

Using all the tools at our disposal, including enforcement and compliance efforts, we will continue to focus on making safer, healthier communities.

I am committed to maximizing the potential of our brownfields program, particularly to spur environmental cleanup and job creation in disadvantaged communities. We are also developing enhanced strategies for risk reduction in our Superfund program, with stronger partnerships with stakeholders affected by our cleanups.

We write today to point out that the Bunker Hill Superfund site is in great need of such attention. As others have noted, "It is time to correct the environmental injustices of the past when an inadequate, unsafe remediation plan was approved under the Bush Administration. "EPA should reopen the site's Record of Decision and establish a health-protective cleanup plan."

Since the Bunker Hill site was listed on the NPL in 1983, citizens have struggled to protect the environment and human health, especially the health of children. Concerns continue to this day, culminating in objections to the decision to move vast amounts of contaminated soils to East Mission Flats Repository. Many individuals and groups have opposed the selection of the site because it is in a floodplain and could contaminate the Coeur d'Alene River. Shifting climatic patterns and more severe flooding could lead to disastrous outcomes. The safety of the site should have been studied before the decision was made, not as part of its implementation. To quote from "Questions and Answers" about the plan: "Surface water flow: Sampling will also be done to study the way surface water flow influences groundwater levels. The data will look at whether high water in the Coeur d'Alene River has a connection to high groundwater levels at East Mission Flats repository."

Furthermore, new information about the hazards of lead make it questionable whether trucking all the dirt to the repository has protected or will protect the community. The clean up level of 1000 ppm for lead is high compared to other sites, such as Jacobsville, Indiana: "Based on levels that will protect human health, EPA selected 400 ppm as the cleanup goal for lead and 30 ppm as the cleanup goal for arsenic. The risk assessment found the cleanup goals of 400 ppm for lead and 30 ppm for arsenic will protect people's health and the environment."

[http://www.epa.gov/region5/sites/jacobsville/pdfs/EPA\\_JNSCS\\_Fact%20Sheet\\_Web\\_June2009.pdf](http://www.epa.gov/region5/sites/jacobsville/pdfs/EPA_JNSCS_Fact%20Sheet_Web_June2009.pdf)

There is a great need for health intervention in the Bunker Hill Superfund Site community.

Many of the recommendations of its ATSDR Health Consultation (September 14, 2000) have not been implemented. ATSDR recommended that EPA: monitor lead levels in house dust following soil remediation to measure remediation effectiveness; evaluate the potential for recontamination, and determine if additional remediation actions, such as cleaning of home interiors, is necessary; consider interior cleaning of homes where indoor dust levels exceed site cleanup goals or where children have elevated blood lead levels; conduct additional evaluations to determine which house dust sampling method, vacuum bag or dust mat, best correlates with lead exposures and blood lead levels in site residents."

The recent report "*Superfund and Mining Megasites: Lessons from the Coeur d'Alene River Basin*" (National Research Council), reviewed and evaluated the scientific and technical basis of EPA's decisions about cleaning up this site. . The full report is available at:

[http://books.nap.edu/openbook.php?record\\_id=11359&utm\\_source=WID%2411616423820100116143908&utm\\_medium=Widgetv3&utm\\_content=11359&utm\\_campaign=Widget&utm\\_term=homeview](http://books.nap.edu/openbook.php?record_id=11359&utm_source=WID%2411616423820100116143908&utm_medium=Widgetv3&utm_content=11359&utm_campaign=Widget&utm_term=homeview)

The Report's Summary included many recommendations about the need for better blood-lead studies:

Children of ages 1 to 4 are the group at highest risk from lead exposure. The committee found it inappropriate that the HHRA presented aggregate data on childhood lead screening for children 0-9 years old, as that information is misleading and tends to underestimate the risk among the principal target group. Furthermore, the annual blood lead sampling of children at fixed sites is suboptimal and produces results with too much potential for nonrepresentative sampling to evaluate the effectiveness of public health intervention strategies in the basin. Universal blood lead screening of children 1-4 years old is warranted for Coeur d'Alene River basin communities, given the prevalence of high concentrations of environmental lead.

The absence of meaningful blood lead studies and health intervention is attributed to "an agreement between community leaders, the state of Idaho, and EPA, which affirmed that no studies would be conducted for "scientific research or academic" reasons (von Lindern 2004)." This agreement should be revisited in the light of the very relevant recommendations in the Megasites report

We urge EPA to respond to all of the report's recommendations, which include precautionary interventions, improved blood lead screening and improvements to the cleanup remedies at

Bunker Hill. Greater protection of community health will lead to many benefits. . It is now widely recognized that there is no "safe" level of lead in children. The December 2009 report, "The Social Costs of Childhood Lead in New Jersey" documented why "reducing sources of environmental lead exposure such that no child would have a blood lead level > 1 µg/dL would reduce costs to the state by at least \$9 billion dollars."

[http://www.state.nj.us/publicadvocate/public/pdf/NJ\\_Lead\\_Report\\_Final-5.pdf](http://www.state.nj.us/publicadvocate/public/pdf/NJ_Lead_Report_Final-5.pdf)

There is now more money available for improving the current efforts at Bunker Hill. "The Obama administration placed \$15 to \$20 million in the stimulus bill to clean up the area", and "ASARCO, agreed to pay the federal government \$1.79 billion to settle the bankruptcy. It included \$435 million specifically for Bunker Hill." EPA should involve affected citizens in deciding how this money is spent.

Sincerely,



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CC:

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